

# EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

MARK R. LEE, M.D.,

Plaintiff,

v.

WEST VIRGINIA UNIVERSITY, WEST  
VIRGINIA UNIVERSITY SCHOOL OF  
MEDICINE and WEST VIRGINIA  
MEDICAL CORPORATION d/b/a  
UNIVERSITY HEALTH ASSOCIATES,

Defendants.

Civil Action No. 1:22-cv-156

Judge Thomas S. Kleeh

**JURY TRIAL DEMANDED**

**PLAINTIFF'S THIRD SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO DEFENDANT WEST VIRGINIA MEDICAL CORPORATION d/b/a  
UNIVERSITY HEALTH ASSOCIATES**

AND NOW, comes the Plaintiff, Mark R. Lee, M.D., by and through his undersigned counsel, JonesPassodelis, PLLC, and propounds the following Third Set of Requests for Production of Documents Directed to Defendant West Virginia Medical Corporation d/b/a University Health Associates and, pursuant to the Federal Rules of Civil Procedure, demands that full, complete, and responsive answers to the Interrogatories and Requests for Production of Documents be served within thirty (30) days of the date of service hereof.

The Requests for Production of Documents shall be deemed to be continuing in nature so as to require the supplementation of your answers if and when additional information should become known in response to the Requests for Production of Documents subsequent to the filing and serving of answers to same.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document has been forwarded to counsel of record by:

\_\_\_\_\_ U.S. First Class Mail, Postage Paid  
\_\_\_\_\_ Hand Delivery  
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\_\_\_\_\_ Electronic Filing/Service

at the following address:

Justin M. Harrison, Esquire  
Laura H. Lorensen, Esquire  
Jackson Kelly PLLC  
500 Lee Street, East, Suite 1600  
Post Office Box 553  
Charleston, WV 25322  
*(Counsel for Defendant, West Virginia Medical Corporation  
d/b/a University Health Associates)*

JONESPASSODELIS, PLLC

Date: June 17, 2024

s/Marie Milie Jones  
MARIE MILIE JONES, Esquire  
CONSTANTINE J. PASSODELIS, Esquire

Counsel for Plaintiff